



Association of Florida Community Developers, Inc.

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October 2, 2019

Mr. Andrew Wheeler, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington, DC 20460

Re: Florida Section 404 Permitting Program Assumption

Dear Administrator Wheeler,

The Association of Florida Community Developers (AFCD) appreciates your agency's efforts to transition Section 404 wetland permitting authority to the Florida Department of Environmental Protection (FDEP). We respectfully request your help in resolving the few remaining issues standing in the way of transitioning the full program to FDEP.

Namely, we request that you support FDEP's recently suggested endangered species consultation framework. The State proposal would provide Florida permitted entities with the same endangered species protection from the State that is currently available through a federally issued Section 404 permit. This is a critical issue. We need your help in ensuring that our members gain the full level of predictability and environmental protection in an FDEP-issued 404 permit.

By way of background, AFCD is an organization comprised of the major community developers in Florida. Our mission is to provide a leadership role in the creation of quality community development and the formulation of a responsible approach to the planning and development of Florida's future. The Florida Department of Environmental Protection's assumption of the 404 permitting program will provide an effective and efficient planning and policy framework for our members, and in turn, it will encourage and support economic development while retaining Florida's many natural assets for generations to come.

On behalf Florida's development community, AFCD appreciates your consideration of our request for assistance on this nationally significant cooperative federalism initiative. We look forward to supporting EPA and FDEP as the State's assumption of the Section 404 permitting program advances towards completion.

Regards,

Lance Pierce
Executive Director, Association of Florida Community Developers

CC: Assistant Administrator David Ross, EPA Office of Water
Secretary Noah Valenstein, Florida Department of Environmental Protection